

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.;
and SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Civil Action No. 2:22-cv-00422-JRG-RSP

JURY DEMANDED

JOINT MOTION FOR ENTRY OF AGREED
PROTECTIVE ORDER

Pursuant to the Court's Order setting a deadline to file a proposed Protective Order (D.I. 12), Plaintiff Headwater Research, LLC ("Headwater") and Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively, "Defendants" or "Samsung"), (collectively, the "Parties") hereby jointly request that the Court enter the proposed Protective Order, attached hereto as Exhibit A.

Dated: April 4, 2023

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Respectfully submitted,

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